

FEDERATION OF FLY FISHERS

Conserving -- Restoring -- Educating through Fly Fishing

Northern California Council

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June 30, 1998

CalFed Bay-Delta Program
1416 - 9th Street, Suite 1155
Sacramento, CA 95814
Attention of Mr. Rick Breitenbach

Subject: Comments, CALFED Draft PEIS/EIR for the CALFED Bay-Delta Program

Dear Mr. Breitenbach:

Our comments are presented in three parts. First, please be advised the CALFED Draft PEIS/EIR is not in compliance with the California Environmental Quality Act and its guidelines. Second, by failing to include the Federal Energy Regulatory Commission in its planning efforts CALFED is potentially imperiling parts of its work. And finally, we request that CALFED add a fourth Water Export Reduction and Water Conservation alternative to its Draft Bay-Delta EIR/EIS, and include a water conservation element in each of the three alternatives and twelve variations contained in its present Program proposal.

The Draft PEIS/EIR does not comply with CEQA in the following ways:

1. It fails to analyze the cumulative impacts of the various alternatives and future probable projects on salmon, steelhead, sturgeon, striped bass and other aquatic species, some of which are designated as "threatened" or "endangered," and their habitat.
2. There are no provisions for mitigation of possible project impacts.
3. There are no provisions to monitor projects to determine if effects are in accordance with CEQA guidelines.

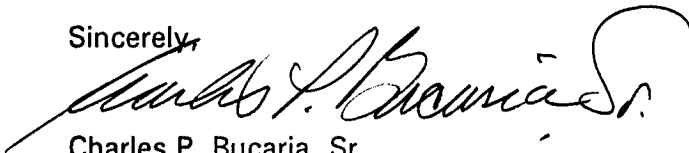
We request that the Revised Draft correct these omissions.

The Federal Energy Regulatory Commission licenses hydro projects all over California, including waters which feed our Central Valley rivers. Oroville reservoir is an example of a FERC licensed project. We understand FERC has not been made a participant in the CALFED process. Under the Rock Creek legal decision FERC has authority over the State Water Resources Control Board in the matter of the release of water for fish, in accordance with state law. Omission of FERC from the CALFED planning effort may result in future controversy. We recommend correction of this oversight, if it exists.

We request inclusion of a Water Export Reduction Alternative, coupled with strong urban and agricultural water conservation elements for each of the alternatives to be presented in the Revised Draft Programmatic EIS/EIR. The principal cause of fishery losses in California's Central Valley rivers and Bay-Delta system is water exports. Dams, pumps and aqueducts are the vehicles by which the water exports have caused such losses. To submit a series of proposals lacking an export reduction alternative is astonishing. To have developed alternative solutions to California's water needs without including water conservation elements represents a major flaw in the process. The enclosed resolution of the Northern California Council of the Federation of Fly Fishers expresses our concern with CALFED's omission of water conservation and water export reduction elements and alternatives from its proposals. These are "reasonable alternatives" and represent "ground zero" in any plan to provide for California's future water needs. Before additional storage or export facilities are contemplated, a broadly based and functioning agricultural and urban water conservation plan is required.

We request that this letter and the enclosed resolution be made a part of the official record.

Sincerely,



Charles P. Bucaria, Sr.
Vice-President, Conservation

Enclosure

cc: Interested Parties